

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

MEI PANG, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

MICHAEL LEVITT, MICHAEL TRZUPEK,  
and DENISE STERLING,

Defendants.

Case No. 1:22-CV-1191-DAE

CLASS ACTION

**JOINT STIPULATION TO EXTEND BRIEFING SCHEDULE**

Lead Plaintiff Morgan Hoffman and named plaintiffs Evan Achee and William J. Emanuel (“Plaintiffs”), and Defendants Michael Levitt, Michael Trzupek, Denise Sterling, Darin Feinstein, Brian Neville, Jarvis Hollingsworth, Matt Minnis, Stacie Olivares, Kneeland Youngblood, Patrick C. Eilers, Theodore J. Brombach, Paul Gaynor, Paul Dabbar, Colleen Sullivan, and Scott Widham (collectively, “Defendants,” and together with Plaintiffs, the “Parties”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, on May 5, 2023, pursuant to the Parties’ Joint Stipulation Proposing Schedule for Pleadings (ECF No. 56), as ordered by the Court (ECF No. 57, “Scheduling Order”), Plaintiffs filed an Amended Class Action Complaint (ECF No. 62, “Amended Complaint”);

WHEREAS, on June 20, 2023, pursuant to the Scheduling Order, Defendants filed their motion to dismiss the Amended Complaint (ECF No. 65, “Motion”);

WHEREAS, pursuant to the Scheduling Order, Plaintiffs' opposition to the Motion is currently due on or by 45 days after the Motion was filed, or August 4, 2023, and Defendants' reply is currently due on or by 30 days from the filing of Plaintiffs' opposition;

WHEREAS, the Parties have not requested any prior extensions or modifications of the briefing schedule set forth in the Scheduling Order;

WHEREAS, Plaintiffs respectfully request a one-week extension of the deadline for Plaintiffs' opposition to the Motion due to unforeseen scheduling conflicts, and Defendants have consented to this extension along with a commensurate 1-week extension for Defendants' reply;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval:

1. Plaintiffs' deadline to file their opposition to Defendants' Motion is extended to August 11, 2023.
2. Defendants' deadline to file their reply in further support of their Motion is extended to on or by 37 days from the filing of Plaintiffs' opposition.

Dated: July 28, 2023

**THE ROSEN LAW FIRM, P.A.**

By: /s/Joshua Baker

Laurence Rosen (*pro hac vice*)  
Phillip Kim (*pro hac vice*)  
Joshua Baker (*pro hac vice*)  
275 Madison Avenue, 40th Floor  
New York, NY 10116  
Phone: (212) 686-1060  
Fax: (212) 202-3827  
Email: lrosen@rosenlegal.com  
Email: pkim@rosenlegal.com  
Email: jbaker@rosenlegal.com

Dated: July 28, 2023

**QUINN EMANUEL URQUHART & SULLIVAN, LLP**

By: /s/John Bash

John Bash  
Texas Bar I.D. 24067504  
300 W. Sixth Street, Suite 2010  
Austin, TX 78701  
Telephone: (737) 667-6100  
Facsimile: (737) 667-6110  
johnbash@quinnmanuel.com

John B. Quinn (*pro hac vice forthcoming*)  
865 S. Figueroa St., 10th Floor

*Lead Counsel for Lead Plaintiff*

**COCHRAN LAW, PLLC**

Stuart L. Cochran  
Texas Bar I.D. 24027936  
8140 Walnut Hill Ln., Suite 250  
Dallas, Texas 75231  
Telephone: (469) 333-3405  
Facsimile: (469) 333-3406  
stuart@scochranlaw.com

*Liaison Counsel for Lead Plaintiff*

**THE SCHALL LAW FIRM**

Brian Schall  
Rina Restaino  
2049 Century Park East, Suite 2460  
Los Angeles, CA 90067  
Phone: (310) 301-3335  
Fax: (213) 519-5876  
Email: brian@schallfirm.com  
Email: rina@schallfirm.com

*Additional Counsel for Lead Plaintiff*

Los Angeles, CA 90017  
Telephone: (213) 443-3000  
Facsimile: (213) 443-3100  
jessebernstein@quinnmanuel.com  
brennanelinson@quinnmanuel.com

Jesse Bernstein (*pro hac vice forthcoming*)  
Brenna Nelinson (*pro hac vice forthcoming*)  
51 Madison Avenue, 22nd Floor  
New York, New York 10010  
Telephone: (212) 849-7000  
Facsimile: (212) 849-7100  
jessebernstein@quinnmanuel.com  
brennanelinson@quinnmanuel.com

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of July, 2023, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

*/s/Joshua Baker* \_\_\_\_\_